

KELLEY DRYE & WARREN LLP

NEW YORK, NY WASHINGTON, DC CHICAGO, IL HOUSTON, TX
LOS ANGELES, CA SAN DIEGO, CA PARSIPPANY, NJ STAMFORD, CT

Michael C. Lynch

3 World Trade Center
175 Greenwich Street
New York, NY 10007

Tel: (212) 808-5082

Fax: (212) 808-7897

mlynch@kelleydrye.com

December 8, 2021

By ECF

The Honorable Vernon S. Broderick, U.S.D.J.
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

APPLICATION GRANTED

SO ORDERED 

VERNON S. BRODERICK

U.S.D.J. 12/9/2021

The conference scheduled for December 10, 2021
at 4:30 p.m. is adjourned until December 16,
2021 at 3:30 p.m.

Re: C.Q. v. Estate of David Rockefeller, et al.,
Civ. No. 20-cv-02205-VSB


Dear Judge Broderick,

We represent the remaining defendants in this case: David Rockefeller, Jr., Richard E. Salomon, and James S. Sligar, solely in their capacities as Co-Executors of the Estate of David Rockefeller, Sr. (collectively, "Defendants"). Pursuant to Your Honor's Individual Rules & Practices in Civil Cases section 1.G, we write to request an adjournment of the status conference scheduled for December 10, 2021 at 4:30 PM.

This is the first request for an adjournment of the status conference. We request an adjournment because of a scheduling conflict. The undersigned, who is lead counsel, will be principal trial counsel, and will be handling the conference, has an oral argument scheduled for the afternoon of December 10, 2021 on two motions to dismiss pending in New York County Supreme Court before the Honorable Deborah A. Kaplan. We have conferred with counsel for plaintiff, who consents to an adjournment of the status conference. In the event the Court wishes to adjourn this into next week, Defendants' counsel can be available anytime on December 13 or 17 or anytime in the afternoons of December 15 or 16.

Accordingly, we respectfully request that the Court adjourn the status conference currently scheduled for December 10, 2021. Thank you for your consideration.

Respectfully,


Michael C. Lynch

cc: Counsel of record (via ECF)